

From: [Granger, Michelle](#)
To: [Watts, Joshua A CIV USARMY CENWK \(US\)](#); [Hauber, Erin M CIV USARMY CENWK \(US\)](#)
Subject: FW: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call
Date: Tuesday, August 14, 2018 4:37:00 PM

Hi, Josh and Erin-

Would Thursday at 10am ET work for you for the call? This time seems to work for Rio Tinto folks. Please let me know.

Thank you!
Michelle-

-----Original Message-----

From: Granger, Michelle
Sent: Tuesday, August 14, 2018 4:16 PM
To: 'Hauber, Erin M CIV USARMY CENWK (US)' <Erin.M.Hauber@usace.army.mil>; 'Watts, Joshua A CIV USARMY CENWK (US)' <Joshua.A.Watts@usace.army.mil>
Subject: RE: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Hi, Josh and Erin-

Could you send me your availability for tomorrow (8/15 morning) and Thursday morning?
Thank you!
Michelle-

-----Original Message-----

From: Hauber, Erin M CIV USARMY CENWK (US) [<mailto:Erin.M.Hauber@usace.army.mil>]
Sent: Monday, August 13, 2018 2:03 PM
To: Granger, Michelle <Granger.Michelle@epa.gov>
Cc: Watts, Joshua A CIV USARMY CENWK (US) <Joshua.A.Watts@usace.army.mil>
Subject: RE: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Hi Michelle,

Any time after 7:30 CST or 8:30 EST Wed morning works for me. I can rearranged some things if I need to call in earlier.

Erin

-----Original Message-----

From: Granger, Michelle [<mailto:Granger.Michelle@epa.gov>]
Sent: Monday, August 13, 2018 12:12 PM
To: Hauber, Erin M CIV USARMY CENWK (US) <Erin.M.Hauber@usace.army.mil>
Subject: [Non-DoD Source] Fw: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Hi, Erin-

I sent the message below to Luis Hidalgo last week. His response is below. Kim is on vacation, but I don't want to hold it up. Please let me know your availability for Wed. morning. I am not available Wed. afternoon.

Thank you!

Michelle-

From: Hidalgo, Luis (G&I) <Luis.Hidalgo@riotinto.com>
Sent: Thursday, August 9, 2018 4:17 PM
To: Granger, Michelle
Cc: Bruce Kennington; Oconnell, Kimberly; Zizila, Frances
Subject: RE: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Dear Michelle,

Thanks for EPA's feedback and comments.

We're proposing to have a conference call next Wednesday (Aug 15) to discuss the feasibility of additional boreholes prior to the December shutdown, as well as technical limitations of such equipment and design timeline commitment. We'll have responses to your email below to be discussed during the call.

Bruce will schedule the call, at a time that suits you and your team.

Regards,

Luis Hidalgo
Project Manager, Principal Advisor

Rio Tinto

4700 Daybreak Parkway, South Jordan, UT 84009
T: +1 801 569 6412 M: +1 435 932 3965
luis.hidalgo@riotinto.com <<mailto:luis.hidalgo@riotinto.com>> Blocked<http://www.riotinto.com/>
<Blocked<http://www.riotinto.com/>>

Rio Tinto Services Inc. Registered office 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808 USA.

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From: Granger, Michelle <Granger.Michelle@epa.gov>
Sent: Thursday, August 9, 2018 11:06 AM
To: Hidalgo, Luis (G&I) <Luis.Hidalgo@riotinto.com>
Cc: Bruce Kennington <bkennington@ramboll.com>; Oconnell, Kimberly <OConnell.Kim@epa.gov>; Zizila, Frances <Zizila.Frances@epa.gov>
Subject: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Dear Luis,

EPA has reviewed the PDI next steps slides and proposal discussed on our technical call on 7/2/18. EPA has two issues with the PDI proposal presented on the call:

1. Scope of the PDI -

EPA believes further delineation to the north of PDI-SB25 and to the south of PDI-SB26 is still necessary. Both PDI-SB25 and 26 were installed within the hallway parallel to the molding room, outside the manufacturing area. Our understanding is that installation of those borings did not require shutdown. For that reason, we would like to know whether two additional borings (see figure attached) can be installed to the north and south of PDI-SB25 and 26, respectively, now while the Albea plant is in operation? These two additional borings are needed in addition to the proposed borings within the manufacturing area to determine the extent of contamination and treatment area.

2. Schedule of the Project -

The OU3 Preliminary Design Report (30% design) is scheduled to be submitted in September 2018. Under paragraph 12 of the Consent Decree and Section VI.C.4, the 30% RD report is to contain the results of the PDI sampling. EPA had expected that all of the results of the PDI would be included in the 30% RD report.

During our technical call with PPPI/Rio Tinto on Monday, July 2nd, EPA was informed that additional sampling needed for the PDI in the manufacturing area adjacent to the molding room is not scheduled for another 5 months until the end of December 2018 when the Albea plant will be shut down for a period of time. Absent additional information from PPPI/Rio Tinto documenting their efforts to secure an earlier date for this sampling from Albea as well as the reasons that an earlier date is not possible, EPA does not consider the December sampling date to be reasonable. The two additional borings mentioned in item #1, the ones north and south of PDI-25 and PDI-26 could be done now, while the plant is in operation; therefore, EPA does not see a reason for delaying those two borings. In addition, in an effort to complete the proposed borings sooner, PPPI/Rio Tinto should consider other options, including using two rigs to obtain the soil borings in a shorter period of time which would reduce the impact to Albea's operations. Obtaining the results of the soil borings sooner than December 2018 will enable those results to be presented in the 90% Design Report to be submitted to EPA in January 2019 and will build in extra time in case those results require stepping out for additional sampling. It is very important to EPA that the final RD report is completed by February 28, 2019 so that this project remains on schedule.

Please feel free to contact me if you have any questions.

Sincerely,

Michelle Granger, EPA RPM

212-637-4975